
RECORD NO. 15-1377

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

ROBERT B. HOLT, individually; DORIS HOLT,
Estate of Doris Holt by and through Robert B. Holt, sole beneficiary,

Plaintiffs-Appellants,

v.

SUSAN STROMAN; PRINCESS HODGES; SUSAN TILLMAN; KATHY BEERS; JENNIFER BREWTON; UNIHEALTH POST ACUTE CARE OF COLUMBIA; LATOYA BUGGS-WILLIAMS; SGT. DARIN L. DOUGHERTY; SGT. GEORGE A. DRAFTS; COLUMBIA POLICE DEPARTMENT; ANDRE BAUER; KEN ARD; BETH SCHULER; CRYSTAL PAVLICK; PALMETTO HEALTH; PALMETTO SENIOR CARE; UHS-PRUITT CORPORATION; LT. COL. CARL BURKE; BRENDA HODGES; PAMELA DANZLER; UNIHEALTH ORANGEBURG SC; APRIL MERILL; JAYSON BRING,

Defendants-Appellees,

and

SOUTH CAROLINA, THE STATE OF; SOUTH CAROLINA DEPARTMENT OF SOCIAL SERVICES; BRENDA HUGHES, individually and in her official capacity as Administrator with UniHealth; SC OFFICE ON AGING, THE; CERTAIN UNKNOWN JOHN DOES, in their individual and official capacities; SOUTH CAROLINA OMBUDSMAN'S OFFICE,

Defendants.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

**MOTION FOR EXTENSION TO
FILE RESPONSE BRIEF OF APPELLEES**

The Appellees respectfully move this Court, pursuant to Rule 31(a), FRAP, and Local Rule 31(c), for a ten day extension until November 20, 2015, to file the Appellees' Joint Response Brief.

The Appellees' motion is based on the following grounds:

1. Based upon the current briefing order, the Appellees' Joint Response Brief is due to be filed by November 10, 2015.
2. Andrew F. Lindemann, the undersigned counsel for the Appellee Beth Shuler who is lead counsel and responsible for preparing the brief for all Appellees, will be unable to complete the preparation and drafting of the Appellees' Response Brief by the current deadline because of other obligations and deadlines. In addition, Mr. Lindemann has spent time out of office in the past week to tend to a family medical issues. Additional time is also needed to coordinate the brief among the numerous counsel for the various Appellees.
3. No prior extensions have been requested by the Appellees.

4. Counsel for the Appellants has been consulted about the requested extension, but no response has been received.

5. However, it is not anticipated that the Appellants will object to this extension given that the Appellants have requested and were granted several extensions for the filing of their Opening Brief. By way of background, on April 24, 2015, a briefing order was issued requiring the filing of the Joint Appendix by June 3, 2015. (Dkt. #11). The Appellants' counsel was granted an extension through July 6, 2015, and an amended briefing order was issued to that effect. (Dkt. #19). The Appellants' counsel then requested and was granted another extension through August 5, 2015. (Dkt. #33). A third extension was requested and granted through September 8, 2015. (Dkt. #37). Finally, a fourth extension was requested and granted through October 8, 2015. (Dkt. #45).

WHEREFORE, the Appellees, through their undersigned counsel, respectfully request that the Court grant an extension until November 20, 2015, for the filing and service of the Appellees' response brief.

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November 9, 2013

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF users:

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